

KEN THERRIEN
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Attorney for Defendant

MIGUEL REYES-GARCIA

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON
(Honorable Edward F. Shea)

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MIGUEL REYES GARICA,

Defendant.

NO. 4:15-CR-6049-EFS-21

DEFENDANT'S CLARIFICATION
TO UNITED STATES MOTION
FOR EXTENSION OF TIME
(ECF 928)

Date: September 27, 2018
Without Oral Argument

COMES NOW, Ken Therrien the attorney for the defendant Miguel Reyes Garcia and clarifies its position to the Governments extension of time to file (ECF 928). This motion is based upon the files and records herein and the argument set forth below.

ARGUMENT

The Government is correct that Counsel for Miguel Reyes-Garcia does not object to the extension to October 1, 2018 for the parties to file its trial briefs, trial notices and jury instructions. Counsel for Mr. Reyes-Garcia agreed that the Government request to extend its time to file

OBEJCTION TO MOTION FOR EXTENSION
OF TIME
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1 its trial exhibit list from the September 27, 2018 disclosure date to
2 9:00 a.m. Friday September 28, 2018. Counsel requested this time
3 considering the amount of information which may be involved in the
4 exhibit disclosures. Considering the anticipated number of exhibits
5 that maybe disclosed this would give the defendant valuable time to
6 review these exhibits in preparation for trial scheduled for October
7 10, 2018.
8

9
10 DATED this 27th day of September 2018.
11

12 s/ Ken Therrien
13 KEN THERRIEN, WSBA#20291
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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury of the laws of the State of Washington that on September 27, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

Stephanie Van Marter U.S. Attorney's Office

s/ Ken Therrien
KEN THERRIEN, WSBA#20291
Attorney for Miguel Reyes Garcia